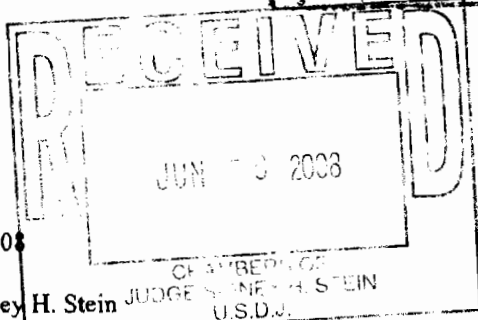


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June 9, 2008

Hon. Sidney H. Stein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Marcella Ballard
Tel: +1 212 626 4664
Marcella.Ballard@Bakernet.com

Via Facsimile

MEMO ENDORSED

RE: *THOIP (a Chorion Limited Company) v. David and Goliath, Inc.* 08 Civ. 963

Dear Judge Stein:

We represent plaintiff THOIP (a Chorion Limited Company) ("THOIP") in the above-referenced matter and write on behalf of both parties to request that Your Honor enter a brief stay of the proceedings to allow the parties to continue to explore settlement. We had a settlement conference today in front of Judge Gorenstein and made headway on many issues.

We are currently scheduled for the following events:
Tuesday, June 10, 2008 – David and Goliath, Inc.'s Answer due;
Friday, June 27, 2008 – Case Management Conference before Your Honor; and
October 2008 – Close of Discovery.

By this letter, the parties are jointly requesting that you stay the proceedings from today up to and through June 27, 2008 (and therefore no pleadings or discovery will be filed or served in that time period). The parties will continue to move toward settlement. To that end, David and Goliath has committed to provide THOIP with new renderings of certain of its characters by June 20, 2008. If the parties have settled by June 27, there will be no need for the conference, however if a settlement is not reached by then, the parties would like to keep that date for a conference before Your Honor. In addition, if the matter does not settle and the schedule resumes on June 27, the parties request that another month be added to the discovery period allowing discovery to close at the end of November 2008 instead of October 2008.

Respectfully Submitted,


Marcella Ballard

cc: Arlana Cohen, Esq.
David Llewellyn, Esq. (THOIP)

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6/9/08
Proceedings stayed
through 6/27/08.
Conf. remains at 6/27
unless a stip of discontinuance
has been filed by then
So ordered.
R. J. W. Stein
ESQ.

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